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12 *Attorneys for Debtors and Reorganized Debtors*

13 **UNITED STATES BANKRUPTCY COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN FRANCISCO DIVISION**

16 **In re:**

17 **PG&E CORPORATION,**

18 **- and -**

19 **PACIFIC GAS AND ELECTRIC**
20 **COMPANY,**

21 **Debtors.**

- 22 ☐ Affects PG&E Corporation
23 ☐ Affects Pacific Gas and Electric Company
24 ☒ Affects both Debtors

25 ** All papers shall be filed in the Lead Case, No.*
26 *19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

DECLARATION OF STEPHEN GEORGE IN
SUPPORT OF REORGANIZED DEBTORS'
NINETY-FIFTH OMNIBUS OBJECTION TO
CLAIMS (PLAN PASSTHROUGH PROOFS
OF CLAIM)

Response Deadline:
July 14, 2021, 4:00 p.m. (PT)

Hearing Information If Timely Response Made:

Date: July 28, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 I, Stephen George, pursuant to section 1746 of title 28 of the United States Code, hereby declare
2 under penalty of perjury that the following is true and correct to the best of my knowledge, information,
3 and belief:

4 1. I am Senior Manager, Enterprise Health, at Pacific Gas and Electric Company (the
5 “**Utility**,” and, with PG&E Corporation as debtors and reorganized debtors, the “**Debtors**,” or, as
6 reorganized pursuant to the Plan, “**PG&E**” or the “**Reorganized Debtors**” in the above-captioned
7 chapter 11 cases (the “**Chapter 11 Cases**”)). I submit this Declaration in support of the *Reorganized*
8 *Debtors’ Ninety-Fifth Omnibus Objection to Claims (Plan Passthrough Proofs of Claim)* (the “**Omnibus**
9 **Objection**”),¹ filed contemporaneously herewith.

10 2. In my current position, I am responsible for overseeing all matters relating to workers’
11 compensation. Except as otherwise indicated herein, all facts set forth in this Declaration are based upon
12 my personal knowledge, the knowledge of other Utility personnel working under and alongside me on
13 this matter, my discussions with PG&E’s professionals and various other advisors and counsel, and my
14 review of relevant documents and information. If called upon to testify, I would testify competently to
15 the facts set forth in this Declaration. I am authorized to submit this declaration on behalf of the
16 Reorganized Debtors.

17 3. My team and I worked with PG&E advisors and professionals, including AlixPartners,
18 LLP (“**AlixPartners**”), which provides interim management services to the Debtors and Reorganized
19 Debtors, to review the list of Workers’ Compensation Claims under the Plan, comprising of HoldCo
20 Workers’ Compensation Claims and Utility Workers’ Compensation Claims, to ensure its completeness
21 and accuracy. For both types of Workers’ Compensation Claims, holders are entitled to pursue their
22 claims against the Reorganized Debtors as if the Chapter 11 Cases had not been commenced. The list
23 formed the basis of **Exhibit 1** to the Omnibus Objection.

24 4. The Omnibus Objection is directed at Proofs of Claim specifically identified in **Exhibit 1**
25 to the Omnibus Objection, in the column headed “Claims To Be Expunged,” and referred to in the
26 Omnibus Objection as “Plan Passthrough Workers’ Compensation Claims.” **Exhibit 1** was prepared by
27 _____

28 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in
the Omnibus Objection.

1 the AlixPartners team from information provided by me, and I have reviewed it to confirm its accuracy.
2 I am familiar with it, its contents, and the process under which it was prepared. To the best of my
3 knowledge, information and belief, **Exhibit 1** accurately identifies Claims designated in the Plan as
4 HoldCo Workers' Compensation Claims and the Utility Workers' Compensation Claims.

5 5. Each of the Plan Passthrough Workers' Compensation Claims identified on **Exhibit 1**
6 will pass through the Chapter 11 Cases unaffected by the Plan, as provided for in sections 4.9 and 4.28
7 of the Plan. As stated expressly in these sections, these Claims are unimpaired, and the holders of these
8 Claims are free to pursue them unaffected by the Plan.

9 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
10 correct to the best of my knowledge, information, and belief. Executed this sixteenth day of June, 2021.

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12 /s/ Stephen George
13 Stephen George
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